

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF OKLAHOMA**

| | | |
|----------------------------------|---|-----------------------------------|
| GREAT LAKES INSURANCE SE, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 6:23-CV-00052-JAR |
| vs. |) | |
| |) | |
| WAGNER & LYNCH, PLLC, |) | |
| |) | |
| Defendant. |) | |

**PLAINTIFF GREAT LAKES INSURANCE SE'S
HYBRID/EXPERT DISCLOSURES UNDER FRCP 26(a)(2)**

Pursuant to Federal Rule of Civil Procedure 26(a)(2), and according to *Kumho Tire Co., Ltd. et al. v. Carmichael et al.*, 526 U.S. 137 (1999), Plaintiff Great Lakes Insurance SE discloses the following information:

1. Identity of witnesses that Plaintiff may use at trial to present evidence under Federal Rule of Evidence 702, 703, or 705.

Representative of Superior Plumbing
1474 Blackberry Road
Indianola, OK 74442

Representative of FloodServ
201 W Cherokee Ave.
McAlester, OK 74501

Representative of Baytown Construction, LLC
P.O. Box 375
Crowder, OK 74430

2. Subject matter on which the above witnesses are expected to present evidence under Federal Rule of Evidence 702, 703, or 705.

In addition to presenting factual testimony relevant to the claim, each witness may also opine as to the general accepted practices in their respective fields (plumbing, remediation, and construction respectively). This includes cost estimates, facts, and data used to conclude what actions each witness took in respect to this claim.

3. **Summary of the facts and opinions to which the witnesses are expected to testify.**

In addition to presenting factual testimony relevant to the claim, each witness may also opine as to the general accepted practices in their respective fields (plumbing, remediation, and construction). This includes cost estimates, facts, analyses, and data used to conclude what actions each witness took in respect to this claim. These witnesses have not been specifically retained to provide expert testimony, therefore no written expert report is required.

DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.

By: s/ Alexandra J. Gage
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Attorneys for Plaintiff Great Lakes Insurance SE

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of June, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Wesley Cherry
Wes.foundationlaw@gmail.com

s/ Alexandra J. Gage